

## UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

United States of America  
v.  
ALEXANDER WEATHERSPOON

**SEALED**

Case No.  
1:20-MJ-0679

\_\_\_\_\_  
*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of \_\_\_\_\_ [See Below] \_\_\_\_\_ in the county of \_\_\_\_\_ Marion \_\_\_\_\_ in the  
Southern District of \_\_\_\_\_ Indiana \_\_\_\_\_, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. §§ 1341 and 2

Mail Fraud and Aiding and Abetting (Count 1: 2/7/18-2/8/18; Count 2: 2/13/18; Count 3: 2/28/18; Count 4: 2/28/18-3/5/18; Count 5: 4/5/18-4/6/18)

18 U.S.C. § 1028A

Aggravated Identity Theft (Count 6: 2/7/18-2/15/18; Count 7: 2/21/18-4/11/18; Count 8: 4/5/18-4/18/18)

18 U.S.C. § 1001

False Statements (Count 9: 8/27/19)

This criminal complaint is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.

/s/ Charmaine Barfield

*Complainant's signature*

Charmaine Barfield, Special Agent, FBI

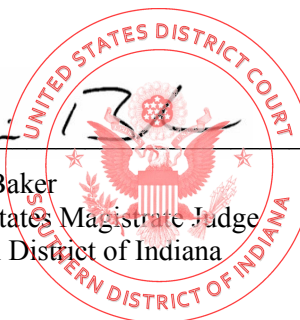
*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by  
\_\_\_\_\_  
telephone \_\_\_\_\_ (reliable electronic means)

Date: August 10, 2020

City and state: Indianapolis, Indiana

Tim A. Baker  
United States Magistrate Judge  
Southern District of Indiana



**AFFIDAVIT IN SUPPORT OF APPLICATION FOR A CRIMINAL  
COMPLAINT AND ARREST WARRANT**

I, Charmaine E. Barfield, Special Agent, Federal Bureau of Investigation (“FBI”), being duly sworn, hereby declare as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent (“SA”) with the FBI, and have been since January of 1997. I am currently assigned to the Indianapolis Field Office, Economic Crimes Unit, which has investigative responsibility for complex financial crimes. I have been involved in multiple investigations of mail and wire fraud, and conspiracy, and participated in the execution of search warrants in these investigations.

2. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I am also an “investigative or law enforcement officer” of the United States, that is, an officer of the United States who is empowered by the law to conduct investigations of and to make arrests for the offenses enumerated in Title 18 and Title 21 United States Code, to include Section 1341 (mail fraud).

3. This Affidavit is submitted in support of a criminal complaint charging **ALEXANDER WEATHERSPOON (“WEATHERSPOON”)**, date of birth XX/XX/1995, with mail fraud, aggravated identity theft, and false statements, in violation of Title 18, United States Code, Sections 1341 and 2, 1028A, and 1001 (the “Subject Offenses”):

- a. **18 U.S.C. § 1341 & 2 (Mail Fraud; Aiding and Abetting)** generally prohibits a person from, having devised or intending to devise, any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent

pretenses, representations, or promises, for the purpose of executing such scheme or artifice or attempting to do so, placing in any post office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by the Postal Service, or deposits or causes to be deposited any matter or thing whatever to be sent or delivered by any private or commercial interstate carrier, or takes or receives therefrom, any such matter or thing, or knowingly causes to be delivered by mail or such carrier according to the direction thereon, or at the place at which it is directed to be delivered by the person to who it is addressed, any such matter or thing, and aiding and abetting in doing so;

- b. **18 U.S.C. 1028A (Aggravated Identity Theft)** generally prohibits a person from, during an in relation to any felony violation enumerated in subsection (c) (including mail fraud), knowingly transferring, possessing, or using, without lawful authority, a means of identification of another person; and
- c. **18 U.S.C. § 1001 (False Statements)** generally prohibits a person, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, from knowingly and willfully – falsifying, concealing, or covering up by any trick, scheme, or device a material fact; making any materially false, fictitious, or fraudulent statement or representation; or making or using any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry.

4. The information contained herein was obtained from various sources, including my personal observations, witnesses, documents, or other law enforcement personnel. Wherever

I assert a fact in this affidavit, I either have firsthand knowledge of that fact or have discussed the matter with one of the above-listed individuals or reviewed materials in support of the fact.

5. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that **WEATHERSPOON** committed the Subject Offenses.

### **PROBABLE CAUSE**

#### **Summary of the Scheme to Defraud**

6. From on or before December 2017 through at least February 2019, **WEATHERSPOON** and others (collectively, “TARGETS”) unlawfully obtained personal identifying information (“PII”), to include dates of birth and social security account numbers, of individuals throughout the United States, including many individuals in the Fort Wayne, Indiana area (hereinafter, “VICTIM” or “VICTIMS”). The TARGETS utilized the stolen PII in online applications at out of state car dealerships for the purchase and financing of high-end vehicles. Since financing was secured based on the PII provided on the online application, credit checks were performed and financing was obtained based on the credit score of the identity theft VICTIMS, not that of the TARGETS purporting to be the VICTIMS. For some of these transactions, the vehicle was successfully delivered and the TARGETS and others defaulted on the loan.

7. As described in detail below, the TARGETS obtained and used fraudulent and fictitious contact telephone numbers and email addresses on each fraudulent financing application as a means for the TARGETS to respond to follow-up questions from the dealership

via voice conversations, text messaging, and emails. During these follow-up communications, the TARGETS purported to be the VICTIMS to arrange the purchase, financing, and transportation of the vehicle.

8. The TARGETS requested the dealership mail the financial documents for signatures to an address designated by the TARGETS, including an address in the Southern District of Indiana. The mailings have occurred in a variety of forms, including USPS, FedEx, and UPS. The TARGETS received the mailings containing the financial documents, signed the documents in the VICTIMS' names, and returned the documents via mail to the dealership. For the purchases that were completed, the TARGETS arranged for the vehicle to be picked up from the dealership by a third party transporter. All of this was done without the knowledge and consent of the VICTIMS.

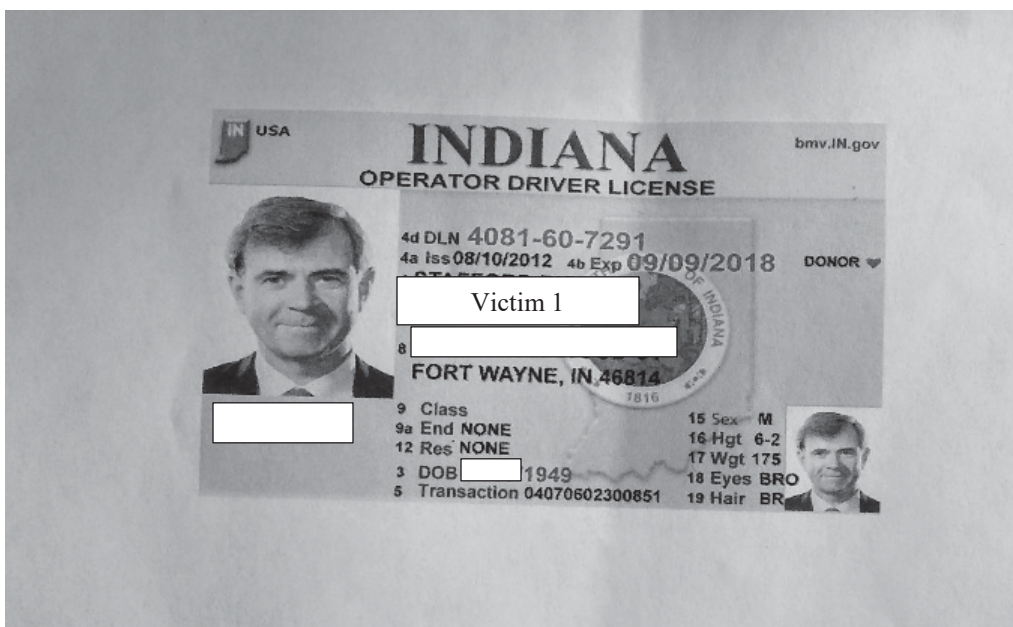
**Modus Operandi**

9. The purchases and attempted purchases of the vehicles contained similar modus operandi:

a. First, the email addresses used by the TARGETS to communicate with the dealership are all similarly structured using the full name of the victims followed by numbers or corporation letters (LLC), such as [VICTIM 1]899@GMAIL.COM, [VICTIM 2]063@GMAIL.COM, [VICTIM 3]LLC@GMAIL.COM, [VICTIM 4]802@GMAIL.COM and [VICTIM 5]53@GMAIL.COM, all of which are Google LLC email accounts. This email structure was observed throughout the investigation for the various VICTIMS.

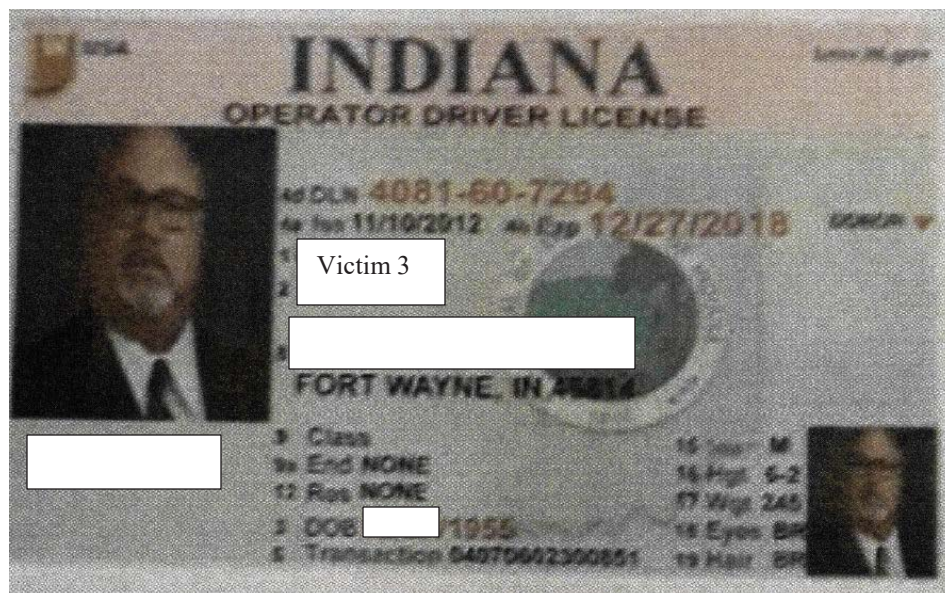
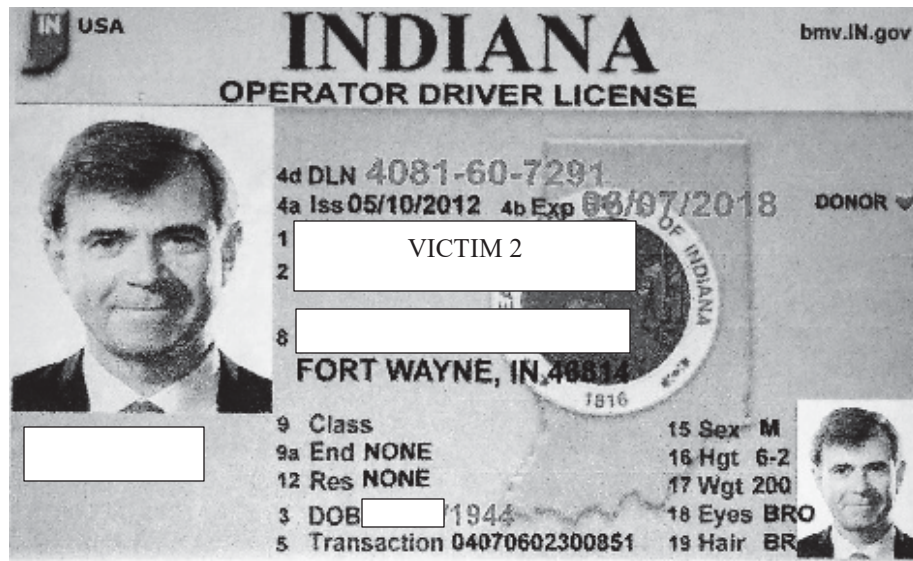
b. In almost all of the specific vehicle transactions described below, the TARGET provided to the car dealership a slightly altered version of an Indiana Driver's License, but which

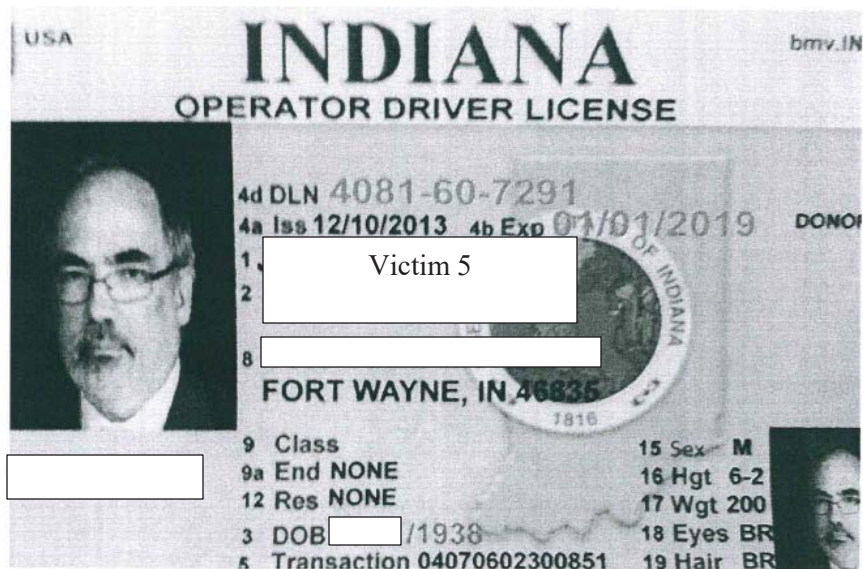
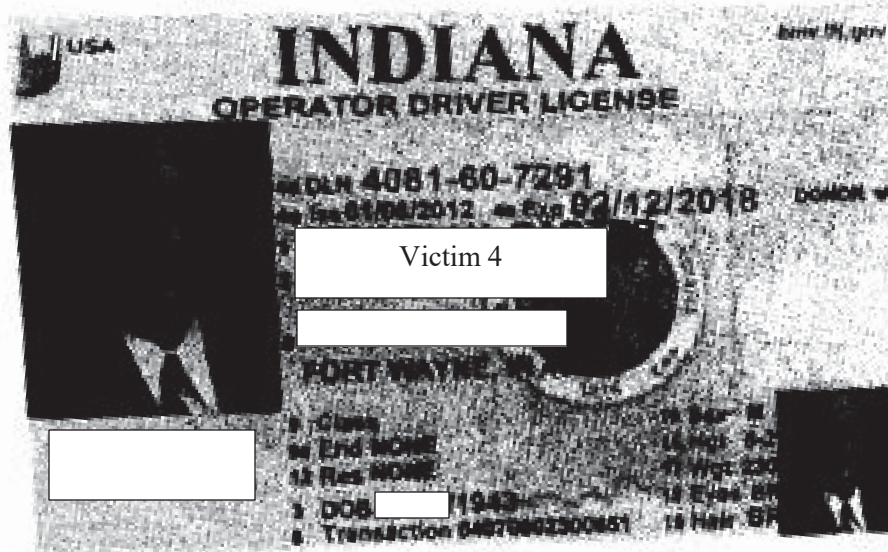
contained the same transaction number and Driver's License number on each license.<sup>1</sup> All of the altered Indiana Driver's Licenses were in the VICTIMS' real names, addresses, and dates of birth. The following is a sample of the altered licenses used during the course of the fraudulent transactions, with the VICTIMS' names, addresses, and dates of birth redacted:



<sup>1</sup> The one exception was the altered Indiana Driver's License for Victim 3, which contained the same transaction number but the driver's license number was one digit off, ending in a "4".









c. Many of the fraudulent Indiana Driver's Licenses observed throughout this investigation, including but not limited to the five Driver's Licenses listed above, contained the following similarities:

- i. Same Indiana Driver's License Number 4081-60-7291 (except for Victim 3 (redacted), described above);
- ii. Same transaction number 04070602300851;
- iii. Real name and home address as the VICTIM;
- iv. Electronic signature font instead of an actual signature;
- v. Fort Wayne, Indiana addresses.

d. Many of the VICTIMS to date reside in Fort Wayne, Indiana, despite the fact that financing and purchasing of vehicles occurred using these identifications at dealerships throughout the United States.

### **The Scheme to Defraud**

#### **2016 Dodge Charger Hellcat – Lamarque Ford (Kenner, Louisiana)**

10. Beginning on or about February 1, 2018, one of the TARGETS purported to be Victim 1 in an attempt to purchase a 2016 Dodge Charger Hellcat, VIN 2C3CDXL97GH218662, from Lamarque Ford located in Kenner, Louisiana, via an online application process.

11. Lamarque Ford provided documentation that showed that during the online process for the purchase and financing of the 2016 Dodge Charger Hellcat, the TARGET submitted the real Victim 1's date of birth, social security number, and home address on the credit application.

12. Agents with the FBI interviewed the real Victim 1, who resided in Fort Wayne, Indiana. Victim 1 confirmed that he did not purchase or attempt to purchase the 2016 Dodge Charger Hellcat, nor did he authorize, consent or allow anyone to use his/her personal information for such purpose.

13. The TARGET provided Lamarque Ford with telephone number 260-702-7483 as a contact number. T-Mobile records for telephone number 260-702-7483 showed the account information with a subscriber S.S. (redacted) at an address of 1459 South Commercial, Chicago, Illinois, and a company account name of Construction LLC. The T-Mobile account was activated on February 2, 2018 and terminated on February 24, 2018. S.S. is the name of another potential victim in this matter.<sup>2</sup> Construction LLC is not listed in the Illinois Secretary of State database, nor is there any association with telephone number 260-702-7483. I and other agents and Postal Inspectors with the FBI and United States Postal Inspection Service have since conducted a further investigation into this company, address and person, and do not believe the T-Mobile phone number to be a legitimate account. Additionally, this phone number communicated with 312-438-6095 (22 calls between February 7, 2018 and February 13, 2018), which **WEATHERSPOON** claims was his telephone number in Instagram posts.

14. The Target utilized the email account [VICTIM 1]899@GMAIL.COM (redacted) to communicate with Lamarque Ford. Google records for the email account [VICTIM 1]899@GMAIL.COM reveal that the account was created on February 1, 2018 and the last login

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<sup>2</sup> The name S.S. is identified on Progressive subpoena returns associated with insuring a 2017 Dodge Charger Hellcat VIN 2C3CDXL9XHH522862 and on FedEx subpoena returns associated with financial documents from Autonation in Brunswick, GA.

date was February 14, 2018. The real Victim 1 stated that he did not create, authorize or use this email account. Given the short timeframe that the account was opened, I believe this email address was created solely for the purpose of communicating with dealerships in furtherance of the Scheme.

15. Additionally, Google records showed that the phone number registered to the [VICTIM 1]899@GMAIL.COM Google Account was 260-418-5172. T-Mobile records did not show any subscriber names, addresses or other personal identifiers associated with the phone number 260-418-5172 during the period of this transaction. The phone number was activated on December 19, 2017 and terminated on December 28, 2017.<sup>3</sup>

16. Google records for the email account [VICTIM 1]899@GMAIL.COM showed that email account was linked to the email account ALEXWEATHERSPOON22@GMAIL.COM through cookie data captured by Google. Based on my training and experience, I know that when accounts are linked by cookies, it means that both email accounts were accessed using the same device (i.e. computer or smartphone). As discussed below, ALEXWEATHERSPOON22@GMAIL.COM is a personal email account used by **WEATHERSPOON**.

17. Google records showed that, on February 1, 2018, the user of the email account [VICTIM 1]889@GMAIL.COM began communicating with the dealership Lamarque Ford. The records further showed that on or about February 2, 2018, [VICTIM 1]889@GMAIL.COM submitted an online credit application to Lamarque Ford to begin the financing process.

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<sup>3</sup> From February 26, 2018 through April 3, 2018, this telephone number was assigned to an individual residing in Fort Wayne, Indiana.

Between February 2, 2018 and February 7, 2018, credit reports revealed twelve credit checks were run for the Victim 1, one of which was from Lamarque Ford on or about February 2, 2018.

18. On or about February 2, 2018, [VICTIM 1]899@GMAIL.COM submitted a copy of the fraudulent Victim 1 Indiana Driver's License depicted in the photographs above. The fraudulent Driver's License was in the name of Victim 1 and contained Victim 1's real date of birth and address, but contained a fraudulent or fictitious Indiana Driver's License number, transaction number, and photograph.

19. On or about February 2, 2018, Lamarque Ford instructed [VICTIM 1]899@GMAIL.COM that they would overnight the paperwork to him. Documentation provided by Lamarque Ford reflected the address 7202 Rosehill Drive, Apt. H, Indianapolis, Indiana, 46260. On or about February 2, 2018, Lamarque Ford ended up sending [VICTIM 1]899@GMAIL.COM the retail purchase agreement via email. On or about February 2, 2018, [VICTIM 1]889@GMAIL.COM sent a photograph of a signed retail purchase agreement for the 2016 Dodge Charger to Lamarque Ford, containing the real Victim 1's name, address, and social security number, but fraudulent driver's license number.

20. On February 3, 2018, Lamarque Ford processed a \$1,000 invoice with a credit card in the name of Victim 1 with the last four digits 0202 to hold the vehicle.

21. On February 5, 2018, Lamarque Ford sent an email to [VICTIM 1]899@GMAIL.COM stating that they were sending the paperwork to a notary in Fort Wayne to verify the signature. No one showed up for the appointment with the notary. The transaction was never completed because Lamarque Ford spoke with the Indianapolis Metropolitan Police Department (IMPD).

22. Documentation from Lamarque Ford revealed that “Victim 1” had been pre-approved for financing with Capital One in the amount of \$59,909.00 for the purchase of the vehicle based on the fraudulent information submitted by [VICTIM 1]899@GMAIL.COM to Lamarque Ford.

**2016 Dodge Charger Hellcat – R M Stoudt  
(Jamestown, North Dakota)**

23. On or about February 7, 2018, a few days after the attempt to purchase the 2016 Dodge Charger Hellcat from Lamarque Ford, a “Victim 1” attempted to purchase a different 2016 Dodge Charger Hellcat, VIN 2C3CDXL95GH338931, this time from R M Stoudt Inc. (“R M Stoudt”) in Jamestown, North Dakota.

24. Similar to the Lamarque Ford transaction, R M Stoudt provided documentation that showed that, during the online process for the purchase and financing of the 2016 Dodge Charger Hellcat, the TARGET submitted the real Victim 1’s date of birth, social security number, and home address on the credit application.

25. FBI agents confirmed with Victim 1 that he did not purchase or attempt to purchase the 2016 Dodge Charger Hellcat, nor did he authorize, consent or allow anyone to use his/her personal information for such purpose.

26. The TARGET provided R.M. Stoudt with the same fraudulent contact telephone number 260-702-7483 and email address [VICTIM 1]899@GMAIL.COM that was used during the Lamarque Ford transaction – the same email address that was linked by cookies to **WEATHERSPOON’s** personal Google account, ALEXWEATHERSPOON22@GMAIL.COM.

27. One of the twelve credit checks on the real Victim 1 discussed above for Victim 1 included one from R M Stoudt.



28. R M Stoudt was directed to send all financial paperwork to 7202 Rosehill Drive, Unit H, Indianapolis, Indiana, 46260.

29. On February 7, 2018, an R M Stoudt Sales and Leasing consultant sent [VICTIM 1]899@GMAIL.COM a picture of the FedEx label with the tracking number, 810993873366, containing financing documents to be sent to 7202 Rosehill Drive, Unit H, Indianapolis, Indiana, 46260 for signatures. That same day, [VICTIM 1]899@GMAIL.COM also emailed R M Stoudt a copy of the same fraudulent Victim 1 Indiana Driver's License that was submitted to R M Stoudt.

30. On or about February 8, 2018, FedEx attempted to deliver the package containing the financing documents to 7202 Rosehill Drive Apartment H, Indianapolis, Indiana. The FedEx driver noticed a sign on the apartment door of 7202 Rosehill Drive, Unit H, directing the driver to not leave packages and to not knock. Upon the FedEx employee leaving the vicinity of 7202 Rosehill Drive, Unit H, the FedEx employee was confronted by an unknown individual claiming the package was for them. Upon the request of the FedEx employee, the individual was unable to provide photo identification at that time. The FedEx employee maintained custody of the package and returned to FedEx.

31. On February 9, 2018, [VICTIM 1]899@GMAIL.COM emailed R M Stoudt Sales and Leasing consultant stating, "Hey Shawn I need you to take the direct signature off the package so they can leave the paperwork at my office also tell them to send it to my office it was a miscommunication thanks address 7202 Rosehill dr apt H Indianapolis,IN 46260".

32. FedEx employees stated that, in the days to follow, FedEx received several calls from telephone number 260-702-7373<sup>4</sup> from an individual purporting to be Victim 1, requesting the package be re-delivered. Given the persistent calls, FedEx contacted R M Stoudt and requested permission to open the package. R M Stoudt authorized FedEx to open the package. Upon opening the package, FedEx discovered financing documents for the purchase of an automobile in the name of Victim 1 and what FedEx believed appeared to be a copy of a fictitious Indiana Driver's License in the name of Victim 1. FedEx then contacted the Indianapolis Metropolitan Police Department ("IMPD"), who referred the case to the FBI.

33. On February 13, 2018, the R M Stoudt Sales and Leasing Consultant received an email from [VICTIM 1]899@GMAIL.COM. In that email, [VICTIM 1]899@GMAIL.COM requested that RM Stoudt send the financing documentation to a different address, 2068 Waterford Place, Unit G, Indianapolis, Indiana (hereinafter, the "Waterford Premises").

34. Officers with IMPD planned a controlled delivery of the financing documentation to the Waterford Premises. On February 13, 2018, law enforcement officers investigating this matter contacted telephone number 260-702-7373 to arrange the re-delivery of the package. The TARGET who answered the call confirmed that the package be delivered to the Waterford Premises.

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<sup>4</sup> T-Mobile records show the telephone number 260-702-7373 account information as a subscriber named James McChesney at Construction LLC, at the same 1459 South Commercial, Chicago, Illinois address as the other allegedly fraudulent phone number discussed above. The account was activated on February 2, 2018 and terminated March 2, 2018. As discussed above, Construction LLC is not listed in the Illinois Secretary of State database. This also does not appear to be a real company or a legitimate T-Mobile account.

35. On February 13, 2018, a controlled delivery of the package containing the R M Stoudt financing documents for the purchase of the 2016 Dodge Hellcat was successfully delivered to the Waterford Premises via a law enforcement officer posing as a delivery driver. A black female signed for and accepted the package at the Waterford Premises. Upon looking at the FedEx Signature records, it appeared the black female signed under the name Victim 1.

36. The black female accepting the package was identified as Ebonie Merriweather (“Merriweather”). Through the course of the investigation, it was determined that Merriweather and **WEATHERSPOON** are cousins. Information received from Social Security Administration and open source information revealed that Merriweather’s mother is the half-sister of **WEATHERSPOON**’s mother.

37. Merriweather is believed to reside at the Waterford Premises. First, the Waterford Premises is listed as Merriweather’s mailing address on her Indiana Driver’s License issued June 3, 2017. Second, during the course of the controlled delivery, a 2011 black KIA Forte, VIN KNAFU4A20B5454287, bearing Indiana license plate number 498TFC (“2011 KIA Forte”) was observed in the vicinity of the Waterford Premises. The 2011 KIA Forte is registered to Merriweather at the Waterford Premises. Additionally, the law enforcement officer posing as the delivery driver who delivered the package identified Merriweather from her Indiana BMV photo as the black female who accepted custody of the package at the Waterford Premises on February 13, 2018. Finally, between June 26, 2018 through July 3, 2018, law enforcement officers conducted surveillance on the Waterford Premises and observed the 2011 KIA Forte parked in front of the Waterford Premises. In addition, a black female resembling Merriweather’s Indiana BMV photo, was seen entering the 2011 KIA Forte during the morning hours during the course

of the surveillance. On the morning of August 15, 2018, I conducted additional surveillance on the Waterford Premises and observed the 2011 KIA Forte parked in front of the Waterford Premises.

38. Between on or about February 13, 2018 and on or about February 14, 2018, the signed financing documents were returned to R M Stoudt via FedEx tracking number 789726857931. The package was signed for by an employee of R M Stoudt. Upon receiving the package, R M Stoudt personnel turned the package over to the law enforcement officers and agents investigating this matter and its contents were submitted to the FBI Laboratory for fingerprint analysis.

39. On April 11, 2018, the FBI Laboratory identified three viable friction ridge prints from the FedEx package, tracking number 789726857931, received by R M Stoudt. After running the fingerprints through a law enforcement database, a positive match was made to **WEATHERSPOON**. According to **WEATHERSPOON's** Illinois Driver's License issued January 19, 2018, **WEATHERSPOON** resided at 8435 S. Manistee Avenue, Chicago, Illinois.

40. FedEx records identified at least six packages from various automobile dealerships addressed to identified VICTIMS of identity theft that have been delivered by FedEx to the Waterford Premises. UPS records identified at least twelve packages from various automobile dealerships addressed to identified VICTIMS of identity theft that have been delivered by UPS to the Waterford Premises.

41. Documentation from R M Stoudt revealed that "Victim 1" had been pre-approved for financing with U.S. Bank in the amount of \$63,094.00 for the purchase of the vehicle based on the fraudulent information submitted by the TARGETS to R M Stoudt. The documentation

also showed that Rite Way Auto Transport was contracted by [VICTIM 1]899@GMAIL.COM to transport the vehicle to 1971 W. 111th Street, Chicago, Illinois, 60643.<sup>5</sup> The vehicle was ultimately not delivered because of law enforcement involvement. Additionally, the credit card utilized for transport, an American Express card ending in #1000, was declined.

**2016 Porsche Panamera GTS – Porsche of Salt Lake City  
(Salt Lake City, Utah)**

42. On February 20, 2018, a TARGET purporting to be Victim 2 (redacted), another victim from Fort Wayne, Indiana, contacted Porsche of Salt Lake City, located in Salt Lake City, Utah, for the financing and purchase of a 2016 Porsche Panamera GTS, VIN WP0AF2A7XGL081186.

43. Similar to the other vehicle transactions described herein, Porsche of Salt Lake City provided documentation that showed that, during the online process for the purchase and financing of the 2016 Porsche Panamera GTS, the TARGET submitted the real Victim 2's date of birth, social security number, and home address on the credit application.

44. The TARGET corresponded with dealership employees utilizing email account [VICTIM 2]063@GMAIL.COM and provided the telephone number 260-999-2622 as a contact number.

45. T-Mobile subscriber records for 260-999-2622 for the period of February 19, 2018 through April 12, 2018 were registered to Victim 2 at 7202 Rosehill Drive, Indianapolis, Indiana. T-Mobile records further show that telephone number 260-999-2622 communicated on February 28, 2018 and March 6, 2018 [14 total calls] with 312-438-6095. Verizon subscriber

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<sup>5</sup> Other emails in the [VICTIM 1]899@GMAIL.COM account show inquiries with Montway Auto Transport.



information for 312-438-6095 show that number as registered to Alexis Weatherspoon – **WEATHERSPOON**'s twin sister – at a residence on Burnham Avenue, Chicago, Illinois (the “Burnham Premises”), where **WEATHERSPOON**'s mother and twin sister resided. The 312-438-6095 had an effective date of September 22, 2017 and disconnection date of August 19, 2018. However, even though the telephone number was registered under the name Alexis Weatherspoon, I believe that **WEATHERSPOON** is the user of that telephone.

**WEATHERSPOON**'s Instagram account directed people to contact **WEATHERSPOON** at telephone number 312-438-6095. Additionally, Western Union and MoneyGram records showed the telephone number 312-438-6095 as **WEATHERSPOON**'s contact number on various money transfers associated with him.

46. Google records for the email account [VICTIM 2]063@GMAIL.COM revealed that the account was created on February 14, 2018 and the last login date was February 26, 2018. Google records further show that the phone number registered to the [VICTIM 2]063@GMAIL.COM was 260-702-7373, the same telephone number used to communicate with FEDEX as Victim 1, discussed above pertaining to the re-delivery of the package by an undercover officer.

47. Similar to [VICTIM 1]899@GMAIL.COM, Google records showed that the [VICTIM 2]063@GMAIL.COM account were also linked by cookie data to **WEATHERSPOON**'s personal email account – ALEXWEATHERSPOON22@GMAIL.COM. This cookie data indicates the same device that accessed ALEXWEATHERSPOON22@GMAIL.COM also accessed the fraudulent email accounts [VICTIM 1]899@GMAIL.COM and [VICTIM 2]063@GMAIL.COM.

48. Google records for [VICTIM 2]063@GMAIL.COM showed that, on or about February 21, 2018, [VICTIM 2]063@GMAIL.COM submitted a credit application online to Porsche of Salt Lake City containing Victim 2's real date of birth, social security number, and home address.

49. During the course of the application process, [VICTIM 2]063@GMAIL.COM was asked to submit a copy of his driver's license. [VICTIM 2]063@GMAIL.COM submitted the fraudulent Victim 2 Indiana Driver's License depicted in the photographs above.<sup>6</sup> The Victim 2 Indiana Driver's License was in the name of Victim 2 and contained Victim 2's real date of birth and address, but contained a fraudulent and fictitious Indiana Driver's License number, transaction number, and photograph – the same photograph, Driver's License number, and transaction number that was on the fictitious Victim 1 Driver's License.

50. On or about February 22, 2018, [VICTIM 2]063@GMAIL.COM requested the financial documentation be sent via FedEx to "office address...2068 Waterford pl Unit G Indianapolis, IN 46260" (the Waterford Premises) for signatures. The Waterford Premises was the same residence where **WEATHERSPOON's** cousin's Merriweather received the Victim 1 purchase agreement paperwork from R M Stoudt.

51. On or about February 23, 2018, a representative from Porsche of Salt Lake City sent the financing documents for the purchase of the 2016 Porsche Panamera GTS via FedEx tracking number 771549387956 in the name Victim 2 at the Waterford Premises, as directed.

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<sup>6</sup> Agents with the FBI have not yet interviewed the true Victim 2. However, based upon the use of the fraudulent Indiana Driver's License, fraudulent email addresses and phone numbers, and similarities in the instant transaction to the other VICTIMS' transactions, all outlined herein, I believe Victim 2 to be another victim of identity theft in this matter.

52. On or about February 27, 2018, Porsche of Salt Lake City received signed financing documents for the purchase of the 2016 Porsche Panamera from “Victim 2” at the Waterford Premises via FedEx tracking number 790782891930.

53. Between on or about February 28, 2018 and on or about March 5, 2018, Porsche of Salt Lake City sent a Porsche Credit Application to Victim 2 at the Waterford Premises via FedEx. [VICTIM 2]063@GMAIL.COM submitted the credit application to Porsche of Salt Lake City by uploading it to Dropbox.

54. Documentation from Porsche of Salt Lake City revealed that “Victim 2” had been pre-approved for financing with Porsche Financial Services in the amount of \$99,083.93 for the purchase of the vehicle based on the fraudulent information submitted by the TARGETS to Porsche of Salt Lake City.

55. A Progressive Insurance policy for the vehicle had been taken out online under policy number 919951066 in the name of Victim 2 effective February 27, 2018 through February 27, 2018. Emails pertaining the Progressive Insurance policy were located in the [VICTIM 2]063@GMAIL.COM account.

56. On February 28, 2018, the 2016 Porsche Panamera was ultimately transported via Lima Transport LLC to Victim 2 at 1972 W. 111th Street Morgan Park, Illinois, as directed by the [VICTIM 2]063@GMAIL.COM.<sup>7</sup>

57. Porsche of Salt Lake City ultimately reported the 2016 Porsche Panamera GTS as stolen.

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<sup>7</sup> Other emails in the [VICTIM 2]063@GMAIL.COM account show inquiries with Montway Auto Transport.

58. Investigators received a Chicago Police Department (CPD) report indicating that, on March 10, 2018, **WEATHERSPOON** was arrested by CPD on charges of receipt and possession of a stolen 2016 Porsche Panamera GTS, VIN WP0AF2A7XGL081186, bearing a temporary Utah license plate number BN34011. This is the same vehicle that the individual purporting to be Victim 2 applied for and purchased from Porsche of Salt Lake City. The CPD report further states that **WEATHERSPOON** was arrested with the vehicle in the vicinity of the Burnham Premises in Chicago, Illinois, where his mother and twin sister resided.

**2017 Dodge Charger Hellcat – Lexus of North Miami  
(North Miami, Florida)**

59. On or about April 5, 2018, a TARGET purporting to be Victim 3, another VICTIM from Fort Wayne, Indiana, attempted to fraudulently purchase a 2017 Dodge Charger Hellcat, VIN 2C3CDXL99HH522805 from Lexus of North Miami, located in North Miami, Florida.

60. Similar to the other vehicle transactions described herein, Lexus of North Miami provided documentation that showed that, during the online process for the purchase and financing of the 2017 Dodge Charger Hellcat, the TARGET submitted Victim 3's real date of birth and home address on the credit application.

61. Agents with the FBI have interviewed the real Victim 3, who resided in Fort Wayne, Indiana. Victim 3 confirmed that he did not attempt to purchase the 2017 Dodge Charger Hellcat, nor did he authorize, consent or allow anyone to use his personal information for such purpose.

62. The home and work telephone listed on the application was 260-702-6790. T-Mobile records show the subscriber to be Construction LLC located at 3245 South Colfax,

Chicago, Illinois, with an activation date of April 3, 2018. As discussed within this affidavit, Construction LLC does not appear to exist, and USPS records show indicate that the address 3245 South Colfax also does not appear to exist.

63. Additionally, a federal warrant was obtained for location information pertaining to telephone 260-702-6790. For the time period of April 13, 2018 through May 18, 2018, the telephone often indicated that it was located at the Burnham Premises in Chicago, Illinois, where **WEATHERSPOON's** mother and twin sister (Alexis Weatherspoon) resided. The telephone number also showed that the phone was located at various locations throughout the Chicago area.

64. The TARGET corresponded with dealership employees utilizing email account [VICTIM 3]LLC@GMAIL.COM. The real Victim 3 stated that he did not create, authorize or use this email account.

65. Google records for the email account [VICTIM 3]LLC@GMAIL.COM showed that the account was created on April 5, 2018 and the last login date was April 9, 2018. Additionally, the phone number registered to [VICTIM 3]LLC@GMAIL.COM was 312-438-6095. Verizon subscriber information show that number as registered to Alexis Weatherspoon located at the Burnham Premises, Chicago, Illinois with an effective date of September 22, 2017 and disconnection date of August 19, 2018. However, even though the telephone number was registered under the name Alexis Weatherspoon, I believe that **WEATHERSPOON** is the user of that telephone. **WEATHERSPOON's** Instagram account directed people to contact **WEATHERSPOON** at telephone number 312-438-6095. Additionally, Western Union and MoneyGram records showed the telephone number 312-438-6095 as **WEATHERSPOON's** contact number on various money transfers associated with him.



66. GOOGLE records for the email account [VICTIM 3]LLC@GMAIL.COM revealed, similar to the other fraudulent email accounts, that email address was linked by cookies to **WEATHERSPOON**'s personal Google account ALEXWEATHERSPOON22@GMAIL.COM. This cookie data indicates the same device that accessed ALEXWEATHERSPOON22@GMAIL.COM also accessed the fraudulent email accounts [VICTIM 1]899@GMAIL.COM, [VICTIM 2]063@GMAIL.COM, and [VICTIM 3]LLC@GMAIL.COM.

67. I reviewed the email content from GOOGLE for the account [VICTIM 3]LLC@GMAIL.COM. The account contained communications between the user of that account and Lexus of North Miami regarding the purchase of the 2017 Dodge Charger Hellcat, VIN 2C3CDXL99HH522805.

68. On or about April 5, 2018, [VICTIM 3]LLC@GMAIL.COM submitted an online credit application to Lexus of North Miami containing Victim 3's personal identifying information on the credit application, including his date of birth and home address, and requested financing from Lexus of North Miami. That same day, [VICTIM 3]LLC@GMAIL.COM submitted the fraudulent Indiana Driver's License containing Victim 3's real date of birth and home address, as depicted in the photographs above.

69. The Internet Protocol addresses pertaining to those communications with Lexus of North Miami all originated in Arizona on April 5, 2018. The account [VICTIM 3]LLC@GMAIL.COM contained emails from AA.COM (American Airlines). One of those emails was a trip confirmation for **WEATHERSPOON** for a flight from Phoenix airport in Arizona to Chicago O'Hare airport in Illinois for April 5, 2018. The second attached a boarding

pass for **WEATHERSPOON** for AA flight 486 departing on April 5, 2018 from Phoenix, Arizona to Chicago, Illinois. This shows that [VICTIM 3]LLC@GMAIL.COM was the listed email address for the purchase of **WEATHERSPOON**'s flight to Arizona and that **WEATHERSPOON** was in Arizona on April 5, 2018. The IP address logins for [VICTIM 3]LLC@GMAIL.COM for April 9, 2018 originate in Illinois.

70. Internet search history for [VICTIM 3]LLC@GMAIL.COM show searches on April 10, 2018 for rich zip codes in Illinois, and on April 11, 2018 for best credit zip codes in Arizona.

71. At some point during the course of the conversations with the dealership, [VICTIM 3]LLC@GMAIL.COM provided a mailing address of the Waterford Premises to which Lexus of North Miami was to send the financing documents for signatures. On April 5, 2018, Lexus of North Miami told [VICTIM 3]LLC@GMAIL.COM that the paperwork was prepared and sent out, and that he should be receiving it the next day.

72. On April 6, 2018, [VICTIM 3]LLC@GMAIL.COM told Lexus of North Miami "Good Morning Sir by any chance you called FedEx and get paperwork sent out to my work unit I sent you earlier and day yesterday they may have sent it out to incorrect address. 2068 Waterford Place Unit G, Indianapolis, IN 46260" (the Waterford Premises). [VICTIM 3]LLC@GMAIL.COM then said "It's fine the package was sent to correct unit just misunderstanding with FedEx and work site."

73. On or about April 6, 2018, someone contacted FedEx purporting to be Victim 3 and requested the financial documents be delivered to a fire case/box outside the location of the Waterford Premises. A FedEx employee disclosed that FedEx does not allow a change of

address to be initiated by anyone other than the sender so FedEx therefore suspended the delivery. Upon placing the parcel in suspended status, FedEx contacted law enforcement officers and agents investigating this matter, who arranged for a controlled delivery to be conducted at the Waterford Premises.

74. On April 10, 2018, a law enforcement officer, posing as a delivery driver, called 260-702-6790 and left a voicemail message regarding the delivery of the financial documents sent from Lexus of North Miami. Within approximately ten to fifteen minutes, a male purporting to be Victim 3 returned the call to a law enforcement officer from 260-702-6790. The law enforcement officer posing as a delivery driver stated to the TARGET that he had a delivery for the Waterford Premises. The TARGET identified himself as Victim 3 and stated he was out of town and had been so for a “couple of days”. The law enforcement officer posing as the delivery driver stated he needed someone at the Waterford Premises to sign for the parcel in order for the delivery company to be compensated for the delivery. The TARGET stated he would attempt to have someone come to the Waterford Premises to sign and accept the package. The TARGET agreed to call back once this was arranged. The TARGET did not call back.

75. Documentation from Lexus of North Miami revealed that “Victim 3” had been pre-approved for financing with Bank of America in the amount of \$64,681.06 for the purchase of the vehicle based on the fraudulent information submitted by [VICTIM 3]LLC@GMAIL.COM to Lexus of North Miami.

76. A Progressive Insurance policy for the vehicle had been taken out online under policy number 920819155 in the name of Victim 3 effective April 5, 2018 through October 10,

2018. Emails pertaining the Progressive Insurance policy were located in the [VICTIM 3]LLC@GMAIL.COM account.

**Orange 2016 Dodge Charger Hellcat – Lou Fusz Alfa Romeo Fiat of Metro East  
(Fairview Heights, Illinois)**

77. In or about February 2019, **WEATHERSPOON** was shot and hospitalized at Wellstar Atlanta Medical Center located in Atlanta, Georgia. I learned that at some time prior to that, **WEATHERSPOON** had moved from Chicago, Illinois to Atlanta, Georgia. **WEATHERSPOON** was ultimately arrested at the hospital on an outstanding state warrant out of Chicago.

78. On February 12, 2019, Atlanta Police Department (“APD”) was dispatched to Wellstar Atlanta Medical Center to check on a vehicle in the parking lot. The vehicle was an Orange 2016 Dodge Charger Hellcat, Illinois License plate AX 18480, VIN 2C3CDXL97GH573847. APD determined the VIN number was not the true VIN number for that vehicle and that the vehicle had been reported stolen. APD was also able to determine the true VIN number for the vehicle as 2C3CDXL96GH338887. I confirmed that the Orange 2016 Dodge Charger Hellcat was registered to a Nakia A. Griffin out of Illinois, and that Nakia Griffin used a fake New York Title for the vehicle (with the fake VIN 2C3CDXL97GH573847) to register it in Illinois. I learned through this investigation that Nakia Griffin is a close friend and/or girlfriend of **WEATHERSPOON**.

79. I obtained records regarding the purchase of the Orange 2016 Dodge Charger Hellcat (original VIN 2C3CDXL96GH338887), which I learned was purchased from Lou Fusz Alfa Romeo Fiat of Metro East (“Lou Fusz”) located in Fairview Heights, Illinois.

80. In October 2018, an application submitted to Lou Fusz Alfa, was signed by an

individual purporting to be “Victim 6” (redacted)<sup>8</sup> of Scottsdale, Arizona to purchase and finance an Orange 2016 Dodge Charger Hellcat, VIN 2C3CDXL96GH338887 in the amount of \$56,443.03. On October 9, 2018, the dealership mailed by UPS Next Day Air the pertinent documents related to the purchase for signature to the individual purporting to be Victim 6 at 1211 North Frances Street, Tempe, Arizona 85281. The documents were returned to the dealership signed by a “Victim 6” via UPS Next Day Air. The vehicle was transported and delivered to an address in Atlanta, Georgia.

81. The application indicated that the purported “Victim 6” was the Owner/CEO of **POMFERPP** Construction with a work phone number of 602-904-8441. The application listed Victim 6’s home phone number as 602-598-3921 and email as [VICTIM 6]@GMAIL.COM. The dealership communicated with “Victim 6” via email and text. “Victim 6” used the email [VICTIM 6]@GMAIL.COM and phone 602-598-3921 to communicate with the dealership.

82. I interviewed the actual Victim 6 on or about August 27, 2019. Victim 6 stated he does not spell his last name with two T’s as written on the application. Victim 6 stated he did not purchase a 2016 Dodge Charger Hellcat from a dealership located in Fairview Heights, IL. Victim 6 never owned nor was he employed by a construction company. Victim 6 never subscribed to nor had telephone numbers 602-904-8441 nor 602-598-3921. Victim 6 stated the Arizona driver’s license number submitted to the dealership, B62867325, was not his driver’s license number. On October 19, 2018, Victim 6 filed a police report with the Maricopa County Sheriff’s Office for Identity theft.

83. A federal search warrant was executed on **WEATHERSPOON**’s iCloud account.

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<sup>8</sup> The real Victim 6 had one “t” in his last name whereas the TARGET(S) used the name Victim 6 with two “t”s in his name.



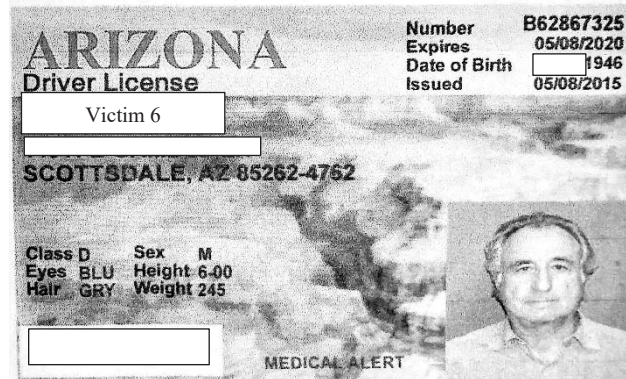
In reviewing the iCloud records, I located the fictitious Victim 6's work phone number of 602-904-8441 listed in a telephone application on **WEATHERSPOON's** phone under the name "Victim 6". I know based on my training and experience, and understanding of various telephone applications that **WEATHERSPOON's** telephone was using the name "Victim 6" to communicate under the guise of the telephone number 602-904-8441.

84. A federal search warrant was also executed on the [VICTIM 6]@GMAIL.COM Google account and telephone number 602-598-3921. In both of those accounts, I located communications not only with Lou Fusz Alfa Romeo Fiat of Metro East located in Fairview Heights, Illinois, but with other dealerships as well in both of those accounts where "Victim 6" is attempting to purchase vehicles. Moreover, in **WEATHERSPOON's** iCloud account, there were many other VOIP identities being used to purchase vehicles in addition to "Victim 6".

85. The [VICTIM 6]@GMAIL.COM account revealed an email on or about October 9, 2018 where "Victim 6", among other things, provided Lou Fusz Alfa Romeo Fiat of Metro East a copy of the following fraudulent driver's license in the name of Victim 6. Like the other fraudulent licenses utilized throughout the Scheme, the Victim 6 used Victim 6's real address on the license<sup>9</sup> but fake number and photograph (in fact, the photograph was a photograph of Bernie Madoff):

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<sup>9</sup> For the date of birth, the fraudulent license had Victim 6's real date of birth, but reversed the month and date.



86. This same Driver's License photograph was located in **WEATHERSPOON's** personal iCloud account during the execution of the iCloud search warrant.

87. Although **WEATHERSPOON** was residing in Atlanta, Georgia during the timeframe of the "Victim 6" deal with Lou Fusz, a review of text messages from **WEATHERSPOON's** iCloud account indicate that he flew to Arizona on or about October 9, 2018 and returned to Atlanta late in the evening on or about October 12, 2018. The text messages suggest that he flew under a fake identity of "Tyler Simmons". These text messages show that **WEATHERSPOON** was in Arizona during the timeframe when the financial documents were mailed to Arizona by Lou Fusz. The text messages also suggest that Nakia was also in Arizona during that timeframe.

88. The text messages from **WEATHERSPOON's** iCloud account discuss, among other things, the purchase and delivery of the Orange Dodge Hellcat Charger. For instance, on October 12, 2018, **WEATHERSPOON** sent a text stating that he grabbed a Hellcat. This is consistent with the purchase of the Hellcat from Lou Fusz. On October 14, 2018, he sent a text containing a photograph of an orange Dodge Charger Hellcat, with temporary license plate 002068061, and what appears to say "Lou" listed on the plate. On October 20, 2018, **WEATHERSPOON** sent another text containing a photograph of an orange Dodge Charger

Hellcat, stating “95,000 it’s suited”, that the car was his, and that no other people were involved. There is a text on October 23, 2018 stating that the orange Dodge Hellcat is coming tomorrow. On December 10, 2018, **WEATHERSPOON** texted an individual regarding the sale of the Hellcat for \$17,500. **WEATHERSPOON** further claims in his text messages that it is his personal car and the VIN is 2C3CDXL97GH573847.

89. There are further texts in the iCloud account containing evidence of the falsification of the Title by Nakia Griffin. On October 21, 2018, **WEATHERSPOON** is sharing texts with the following documents: a verification of insurance document from Progressive for the Charger (VIN ending in 3847) in the name of one of **WEATHERSPOON**’s friends and Certificate of Title for the Charger (VIN ending in 3847) in the name of Nakia Griffin. On October 27, 2018, Nakia sent **WEATHERSPOON** a copy of her temporary driver’s license. On December 15, 2018, **WEATHERSPOON** sent a text discussing Nakia getting in trouble for showing up with the Title but no car. On December 20, 2018, **WEATHERSPOON** sent a text with photographs of the fake Title documents in Nakia’s name, stating that the signatures do not match on the documents.

90. There were many texts in **WEATHERSPOON**’s iCloud account where **WEATHERSPOON** texts the same license that was used during the Victim 6 transaction but modified with different names on the license.

91. On February 28, 2019, I interviewed **WEATHERSPOON** at the Fulton County Jail, in Atlanta, Georgia. The following is a general summary and not a verbatim description of that interview. In general, **WEATHERSPOON** provided a contradicting story regarding the Hellcat that was located in the hospital parking lot. He first told me that “he” purchased the

Hellcat. He then stated that “we” bought the Hellcat; specifically, that Nakia Griffin purchased the 2016 Dodge Hellcat off the street from an individual described by **WEATHERSPOON** as a skinny dude with curls, known to him as part of Shane’s people [referring to a known friend of **WEATHERSPOON**], for \$25,000.00. **WEATHERSPOON** could not provide the name of the “skinny dude with curls”. **WEATHERSPOON** inquired about his property located inside the vehicle.

92. Records from **WEATHERSPOON**’s Instagram accounts between September 8, 2016 and December 25, 2019 revealed numerous photos and videos of **WEATHERSPOON** with high-end vehicles consistent with vehicles purchased using fake identities and displaying large amounts of cash. Specifically, a photograph posted on November 23, 2018 depicted **WEATHERSPOON** posing with an Orange Dodge Charger with two black stripes going down the back of the vehicle which is consistent with a Hellcat model. The license plate of the vehicle has a black stripe blocking out the number. On January 6, 2019, another photo of **WEATHERSPOON** was posted to Instagram, which showed **WEATHERSPOON** sitting on top of an Orange Dodge Charger Hellcat. On the right passenger panel, I observed a sticker which said “Finao #2”, which is an identity I know to be attributed to **WEATHERSPOON** through this investigation. Based on my review of the photographs and my investigation to date, I believe the photograph on the Instagram account depicts the same 2016 Dodge Charger Hellcat purchased under fake identity, Victim 6, at Lou Fusz Alfa Romeo, Fiat of Metro East located in Fairview Heights, Illinois, which was also located in the parking lot of the hospital in Atlanta, Georgia where **WEATHERSPOON** was hospitalized.

**CONCLUSION**

93. Based on the facts set forth in this affidavit, I respectfully submit that probable cause exists to believe that **ALEXANDER WEATHERSPOON** committed the following offenses:

a. **Counts 1 – 5 (Mail Fraud)**: Beginning on or before December 2017 and continuing until at least February 2019, including as specified in each separate Count below, within the Southern District of Indiana and elsewhere, **ALEXANDER WEATHERSPOON**, having devised and intended to devise a scheme or artifice to defraud, and to obtain money or property by means of false or fraudulent pretenses, representations, and promises, to wit: the Scheme described herein, knowingly and with the intent to defraud, placed in any post office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by the Postal Service, or deposited or caused to be deposited any matter or thing whatever to be sent or delivered by any private or commercial interstate carrier, or takes or receives therefrom, any such matter or thing, or caused to be delivered by mail or such carrier according to the direction thereon, or at the place at which it is directed to be delivered by the person who it is addressed, any such matter or thing, any writings, signs, signals, pictures, or sounds for the purpose of executing the Scheme, or attempted to do so, including but not limited to the following mailings:

<b>Count</b>	<b>Date (on or about)</b>	<b>ID Theft Victim</b>	<b>Event</b>	<b>Description of Mailing</b>
1	02/7/2018 – 02/8/2018	Victim 1	Purchase of 2016 Dodge Charger Hellcat (R M Stoudt, Inc.)	Mailing of vehicle purchase paperwork from R M Stoudt, Inc. in Jamestown, North Dakota to 7202 Rose Hill Drive, Apt. H, Indianapolis, Indiana.
2	02/13/2018	Victim 1	Purchase of 2016 Dodge Charger Hellcat (R M Stoudt, Inc.)	Mailing of vehicle purchase paperwork from R M Stoudt, Inc. in Jamestown, North Dakota to 2068 Waterford Place, Apt. G, Indianapolis, Indiana.
3	02/28/2018	Victim 2	2016 Porsche Panamera GTS (Porsche of Salt Lake City)	Mailing of vehicle purchase paperwork from Porsche of Salt Lake City in Salt Lake City, Utah to 2068 Waterford Place, Apt. G, Indianapolis, Indiana.
4	02/28/2018 – 03/05/2018	Victim 2	2016 Porsche Panamera GTS (Porsche of Salt Lake City)	Mailing of vehicle credit paperwork from Porsche of Salt Lake City in Salt Lake City, Utah to 2068 Waterford Place, Apt. G, Indianapolis, Indiana.
5	04/5/2018 – 04/06/2018	Victim 3	2017 Dodge Charger Hellcat (Lexus of North Miami)	Mailing of vehicle purchase paperwork from Lexus of North Miami in North Miami, Florida to 2068 Waterford Place, Apt. G, Indianapolis, Indiana.

Each Count of which is a violation of Title 18, United States Code, Sections 1341 and 2.

b. **Counts 6 – 8 (Aggravated Identity Theft)**: On or about the specific dates listed below, within the Southern District of Indiana and elsewhere, **ALEXANDER WEATHERSPOON**, during and in relation to the foregoing felony violation of Title 18, United States Code, Section 1341 (Mail Fraud) as alleged above, knowingly possessed and used, without lawful authority, a means of identification of another person, in and affecting interstate commerce, that is, the Defendant possessed and used the VICTIM's identifying information, such as name, address, and/or social security number to fraudulently apply for vehicle financing, including but not limited to the following:

Count	Date (on or about)	Victim	Means of Identification
6	02/07/2018 – 02/15/2018	Victim 1	Use of Victim 1's name, address, and social security number to purchase vehicle from R M Stoudt, including submission of fraudulent financing documents and driver's license. [Counts 1 and 2]
7	02/21/2018 – 04/11/2018	Victim 2	Use of Victim 2's name, address, and social security number to purchase vehicle from Porsche of Salt Lake City, including submission of fraudulent financing documents and driver's license. [Counts 3 and 4]
8	04/05/2018 – 04/18/2018	Victim 3	Use of Victim 3's name and address to purchase vehicle from Lexus of North Miami, including submission of fraudulent financing documents and driver's license. [Count 5]

Each Count of which is a violation of Title 18, United States Code, Section 1028A.



c. **Count 9 (False Statements)**: On or about August 27, 2019, within the Southern District of Indiana and elsewhere, **ALEXANDER WEATHERSPOON**, knowingly and willfully made materially false, fictitious and fraudulent statements and representations in a matter within the jurisdiction of the Federal Bureau of Investigation (FBI), that is, during an interview by Special Agents of the FBI about the Orange 2016 Dodge Charger Hellcat, VIN 2C3CDXL96GH338887 located in the Atlanta, Georgia hospital parking lot, **WEATHERSPOON** represented to the FBI that he and/or Nakia Griffin purchased the Orange 2016 Dodge Charger Hellcat from a skinny guy with curls (name unknown) off the street for \$25,000, whereas **WEATHERSPOON** actually purchased and obtained financing of the vehicle from Lou Fusz using fraudulent identification documents of Victim 6.

All of which is a violation of Title 18, United States Code, Section 1001.


I swear under penalty of perjury that the foregoing is true.

/s/ Charmaine Barfield

Charmaine Barfield  
Special Agent  
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Dated: August 10, 2020

  
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Tim A. Baker  
United States Magistrate Judge  
Southern District of Indiana

